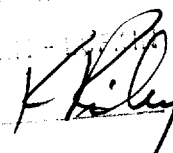


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

FILED - CLERK  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
LUFKIN, TEXAS  
APR 15 2002  
BY: 

JULIO COLEGIO, et al  
Plaintiffs

v.

EQUITABLE ACCEPTANCE CORP., et al.  
Defendants

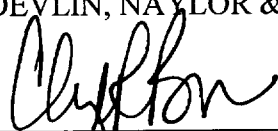
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Civil Action No. 9:01 CV 161  
Judge: Hannah

**EQUITABLE ACCEPTANCE CORPORATION'S  
INDEX TO PRIVILEGE AND PROTECTION CODES  
GLOSSARY OF NAMES AND PRIVILEGE LOG**

Comes now EQUITABLE ACCEPTANCE CORPORATION, Defendant in the above-styled and numbered case, and respectfully submits the following:

- Index to Privilege and Protection Codes . . . . . Attachment 1
- Glossary of Names . . . . . Attachment 2
- Privilege Log . . . . . Attachment 3

Respectfully submitted,  
  
DEVLIN, NAYLOR & TURBYFILL, P.L.L.C.  
  
\_\_\_\_\_  
DONALD L. TURBYFILL  
Texas Bar Number 20296380  
CHERYL R. BROWN  
Texas Bar Number 24004565  
4801 Woodway, Suite 420 West  
Houston, Texas 77056-1805  
713/622-8338 (Telephone)  
713/586-7053 (Facsimile)

ATTORNEYS FOR DEFENDANT,  
EQUITABLE ACCEPTANCE CORPORATION

**CERTIFICATE OF SERVICE**

I, Cheryl R. Brown, do hereby certify that a true and correct copy of the above and foregoing instrument was served on April 18, 2002, as reflected below:

Richard Tomlinson  
Attorney at Law  
One Greenway Plaza, Suite 100  
Houston, Texas 77046  
(713) 627-7747 [phone]  
(713) 627-3035 [facsimile]  
ATTORNEY FOR PLAINTIFFS ..... Via Hand Delivery

Richard S. Fischer  
Attorney At Law  
114 S Pecan Street  
Nacogdoches TX 75961  
(936) 564-2222 [phone]  
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CO-COUNSEL FOR PLAINTIFFS ..... Via Federal Express

  
\_\_\_\_\_  
CHERYL R. BROWN

[REDACTED]

## **INDEX**

Documents found in the following categories contain legal advice, requests for legal advice or services or provide information in connection with the rendering of legal advice or services:

**AC** Confidential communications including documents reflecting confidential communications between client and counsel, between counsel or between client representatives; and

**WP** Reports, statements, correspondence, memoranda or other documents prepared in anticipation of litigation or for trial and/or documents which contain the mental impressions, conclusions, opinions or legal theories or factual analyses of an attorney or other representative or employee of a party concerning litigation.

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**GLOSSARY OF NAMES**

Anderson, C	Partner w/Parnell, Defense Counsel, Alabama Lawsuit
Boyd, William	Former Defense Counsel
Capps, G	Plaintiff, Alabama Lawsuit
Capps, K	Plaintiff, Alabama Lawsuit
Cowles, D	Claims Administrator, GRE Insurance, Insurer of EAC
EAC	Defendant, Equitable Acceptance Corporation
Emmer, T	Counsel for Franklin
Franklin, R	Employee, EAC
Gary Lundeen Co.	Accounting Company, Statement of Accounting
Gerold, Althestine	Buyer, EAC
Henn, Jeffrey	Corporate Representative of Defendant EAC
Lawson, M	Legal Assistant, Hill, Hill, Carter, et al; Alabama
Pace, J	Employee, Southern Surgical Steel
Parnell,	Defense Counsel in Alabama Lawsuit
Tomlinson, Richard	Plaintiff's Counsel
Turbyfill, Donald	Defense Counsel

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**PRIVILEGE LOG**

NUMBER	DOCUMENT DATE	DESCRIPTION	PRESENT LOCATION	PRIVILEGE CLAIMED
<b>EAC000-</b>				
1		Handwritten note from EAC to D. Turbyfill re: procedures	Defense Counsel	AC
2-4	12/14/01	Letter from R. Tomlinson to Boyd re: production of additional documents	Defense Counsel	AC
5		Handwritten note from EAC to D. Turbyfill re: Cali attorney	Defense Counsel	AC
12		Handwritten note from EAC to D. Turbyfill re: Documents available to dealers	Defense Counsel	AC
47		Handwritten note from EAC to D. Turbyfill re: Accounts that you will bill	Defense Counsel	AC
957	8/15/01	Letter from J. Henn to B. Boyd re: summary of events	Defense Counsel	AC
959-970		Copy of Original Complaint with handwritten notes	Defense Counsel	WP
<b>ALEAC000-</b>				
2	1/2/98	Letter from R. Bradford to D. Cowles re: deposition notices enclosed:	Defense Counsel	AC
18-20	1/28/98	Letter from R. Bradford to D. Cowles re: enclosed copy of Scheduled Conf Order	Defense Counsel	AC
21	1/28/98	Letter from R. Bradford to D. Cowles re: enclosed copy of deposition notices:	Defense Counsel	AC
24-25		Letter from R. Bradford to D. Cowles	Defense Counsel	AC
48-50	2/15/98	Letter from R. Bradford to D. Cowles re: enclosed first page of notice	Defense Counsel	AC
62	2/18/98	Letter from R. Bradford to D. Cowles - transmittal	Defense Counsel	AC
63	2/27/98	Letter from R. Bradford to J. Henn re: Plaintiff wants to take deposition	Defense Counsel	AC
64	2/27/98	Letter from R. Bradford to T. Emmer re: enclosed Deposition notices	Defense Counsel	WP
65	3/3/98	Letter from J. Henn to B. Bradford re: B. Franklin will be available for deposition	Defense Counsel	AC



216	12/21/97	Letter from R. Bradford to D. Cowles re: scheduling conference	Defense Counsel	AC
242	8/6/96	Letter from J. Henn to Parnell enclosing docs	Defense Counsel	AC
243	8/15/96	Letter from C. Anderson to J. Henn re: R. Bradford retained to represent EAC	Defense Counsel	AC
244	8/26/96	Letter from R. Bradford to D. Cowles re: look forward to represent EAC	Defense Counsel	AC
247-249	8/27/96	Letter from D. Cowles to J. Henn re: R. Bradford retained by GRE Ins to represent EAC	Defense Counsel	AC
304-305	10/9/96	Letter from R. Bradford to D. Cowles re: Plaintiff mtn to remand	Defense Counsel	AC
311	10/21/96	Letter from R. Bradford to D. Cowles re: remand	Defense Counsel	AC
312	11/6/96	Letter from R. Bradford to D. Cowles re: deposition schedule	Defense Counsel	AC